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January 22, 2007

Mr. Daniel D. Mitchell
Engineering and Construction Division,
Program Management Branch, Section ED
Department of the Army, Kansas City District, Corps of Engineers
700 Federal Building
601 East 12th Street
Kansas City, MO 64106-2896

RE: Request for concurrence of Closure of Property recommendations letter dated 30 November 2006 and Re-Examination Request Assessment Report, St. Louis Tank Armor Plant

Dear Mr. Mitchell:

In response to your letter dated November 30, 2006, the Missouri Department of Natural Resources does not concur with the U.S. Army Corps of Engineers (USACE) designation of "No Department Of Defense Action Indicated" (NDAI) for the St. Louis Tank Armor site. The information collected suggests that there are enough potential for releases to warrant further investigation. Furthermore, our file for this site contains an undated document entitled Installation Assessment of Gateway Army Ammunition Plant, Report No. 152. Appendix A, Photograph of Gateway Army Ammunition Plant, which includes a reproduction of a photograph entitled "Disposal Area of Scullen Steel – Property," located across the Des Peres River. This reproduction shows huge piles of uncontrolled waste.

The department reviewed the Re-Examination Request Assessment Report, St. Louis Tank Armor Plant, and feels that the information contained in the report was confusing. For example, Appendix C of the report provides the floor plan for the Gateway Army Ammunition Plant, not the St. Louis Tank Armor Plant. Historically, the USACE has addressed the St. Louis Tank Armor Plant and the Gateway Army Ammunition Plant together. The department was recently informed of the USACE's intent to address these sites separately. As a result, we request that the Gateway portion of the report be removed in order to better determine whether the NDAI classification is appropriate for the Saint Louis Tank Armor Site.

If you have questions or concerns you may contact Mr. Mitchell C. Scherzinger of my staff, or me at the Missouri Department of Natural Resources, Hazardous Waste Program, P. O. Box 176,





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Jefferson City, Missouri 65102-0176. Mr. Scherzinger may be reached by telephone at (573) 522-5045, or you may contact me at (573) 751-7757.

Sincerely,

HAZARDOUS WASTE PROGRAM

Ruben Zamarripa, Chief Department of Defense Unit Federal Facilities Section

Kelen Zamanja

RZ:msd

c: Ms. Jamie Bernard-Drakey, U.S. Environmental Protection Agency, Region VII Ms. Judith Meier – USACE – Kansas City Office